

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JASON GOODMAN,

Plaintiff,

v.

THE CITY OF NEW YORK and NEW YORK  
CITY POLICE DEPARTMENT, NEW YORK  
CITY POLICE DEPARTMENT  
LIEUTENANT GEORGE EBRAHIM, NEW  
YORK CITY POLICE DEPARTMENT  
OFFICER CHANDLER CASTRO, NEW  
YORK CITY POLICE DEPARTMENT  
OFFICER JENNIFER CARUSO, NEW YORK  
CITY POLICE DEPARTMENT OFFICER  
KELVIN GARCIA, JOHN DOE 1, JOHN  
DOE 2, JOHN DOE 3, JOHN DOE 4, JANE  
DOE, (fictitious names intended to be officers,  
representatives, agents, servants of the New  
York City Police Department, individually and  
in their official capacities, ELON MUSK, X  
CORP, ADAM SHARP,

Defendants.

No. 1:23-cv-09648-JGLC

ORAL ARGUMENT REQUESTED

**DEFENDANT X CORP.'S NOTICE OF MOTION TO DISMISS  
THE COMPLAINT FOR FAILURE TO STATE A CLAIM**

For the reasons set forth in the Memorandum of Law in Support of Defendant X Corp.'s Motion to Dismiss the Complaint for Failure to State a Claim, filed concurrently, Defendant X Corp. hereby moves this Court to dismiss all claims asserted against X Corp. in the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

WHEREFORE, X Corp. requests that this Court dismiss without leave to amend each claim asserted against X Corp. in the Complaint, and requests any other relief that this Court deems appropriate.

X Corp. requests oral argument on this Motion.

Respectfully submitted,

WILLENKEN LLP

/s/ Kenneth M. Trujillo-Jamison

Kenneth M. Trujillo-Jamison  
(motion for *pro hac vice* pending)

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Dated: December 4, 2023